

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

USAMA JAMIL HAMAMA, et al.,

Petitioners and Plaintiffs,

v.

REBECCA ADDUCCI, et al.,

Respondents and Defendants.

Case No. 2:17-cv-11910
Hon. Mark A. Goldsmith
Mag. David R. Grand
Class Action

DECLARATION OF BRADLEY MAZE

I, Bradley Maze, make this statement under the penalties of perjury of the laws of the United States and if called to testify I could and would do so competently based upon my personal knowledge as follows:

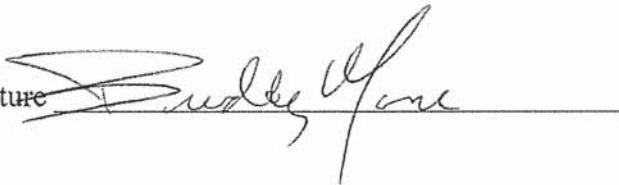
1. I am a lawyer admitted to practice in the state of Michigan. I have substantial experience in the area of immigration law.
2. I represent Sarkoun Ablahid, an immigration detainee housed in the Calhoun County Correctional Center, in Battle Creek, Michigan, in his immigration case.
3. I have explained to Mr. Ablahid the options available to him, under immigration law and procedure and the ongoing federal case, Hamama v. Adducci.
4. Mr. Ablahid is an Iraqi national, with a final order of removal that existed on June 24, 2017. Therefore, it is my understanding that he is a class member in the Hamama litigation, temporarily protected from removal by the Preliminary Injunction granted in that case on July 24, 2017. His A# is [REDACTED]. His case is currently on appeal with the Board of Immigration Appeals.
5. Mr. Ablahid had expressed interest in waiving coverage by the Preliminary Injunction and seeking prompt removal to Iraq. The meeting I had with him was to provide assurance that any such waiver was knowing and voluntary.
6. I met with Mr. Ablahid on May 23, 2018 at the detention facility already mentioned. We spoke for 15 minutes. I explained to him his prospects along with the possibility of prolonged detention and the potential routes out of detention short of removal.

7. I communicated in English, a language Mr. Ablahid seemed to understand well. I believe that my communication with Mr. Ablahid was effective.
8. On the basis of my conversation with Mr. Ablahid, considering the information I conveyed and his responses to me, I believe that he wishes to be promptly removed to Iraq, and that this waiver of the protections provided by the Hamama Preliminary Injunction is both knowing and voluntary. Moreover, he also consented to a withdrawal of his appeal before the Board of Immigration Appeals, thereby effectuating an active final order of removal.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

Executed this 24 day of May, 2018 in Southfield, Michigan.

Signature

A handwritten signature in black ink, appearing to read "Bradley J. Gane", is written over a horizontal line. The signature is stylized with a large, looped initial 'B' and a long, sweeping tail.